

**Cour
Pénale
Internationale**

**International
Criminal
Court**



Original: **English**

No.: **ICC-01/21-01/25**
Date: **26 October 2026**

TRIAL CHAMBER III

Before: Judge Joanna Korner, Presiding Judge
Judge Keebong Paek
Judge Nicolas Guillou

SITUATION IN THE REPUBLIC OF THE PHILIPPINES

IN THE CASE OF *THE PROSECUTOR* v. *RODRIGO ROA DUTERTE*

**Public
with Confidential Annex A**

Public Redacted Version of “Prosecution’s third application under rule 68(2)(b) to introduce into evidence Prior Recorded Testimonies of Witnesses P-1334 and P-1348”, 21 October 2016, ICC-01/21-01/25-526-Conf

Source: Office of the Prosecutor

Document to be notified in accordance with regulation 31 of the *Regulations of the Court* to:

☒ **The Office of the Prosecutor**

☒ **Counsel for the Defence**

☒ **Legal Representatives of the Victims**

☐ **Legal Representatives of the Applicants**

☐ **Unrepresented Victims**

☐ **Unrepresented Applicants
(Participation/Reparation)**

☐ **The Office of Public Counsel for
Victims**

☐ **The Office of Public Counsel for the
Defence**

☐ **States' Representatives**

☐ **Amicus Curiae**

REGISTRY

Registrar

☐ **Counsel Support Section**

M. Osvaldo Zavala Giler

☐ **Victims and Witnesses Unit**

☐ **Detention Section**

☐ **Victims Participation and Reparations
Section**

☐ **Other**

I. INTRODUCTION

1. The Prosecution requests the formal submission of the statements and associated material (“Prior Recorded Testimonies”)¹ of witnesses P-1334 and P-1348 (“Two Witnesses”) in accordance with article 69(2) and (4) of the Rome Statute (“Statute”), rule 68(2)(b) of the Rules of Procedure and Evidence (“Rules”), and the “Directions on the Conduct of Proceedings” (“Directions”).² The Prosecution further requests the designation of the Registry Legal Counsel, or any appropriate person delegated by him, as the person authorised to witness declarations required pursuant to rule 68(2)(b)(ii) and (iii) of the Rules.³

2. As submitted, the Prior Recorded Testimonies of the Two Witnesses relied on by the Prosecution do not relate to the acts and conduct of the Accused. They primarily relate to the contextual elements of crimes against humanity, particularly a policy to ‘neutralise’ through violent crimes, including murder, alleged criminals in the Philippines; and the widespread and systematic nature of such crimes.⁴ As [REDACTED], the Two Witnesses provide evidence on [REDACTED] roles in the implementation of Mr Duterte’s “war on drugs” and the shift in the conduct of [REDACTED] after Mr Duterte became President. The evidence of P-1334 also relates to Incidents 13 and 53.⁵

3. The Prior Recorded Testimonies of P-1334 and P-1348 are therefore relevant, reliable, probative, and suitable for formal submission in written form, as explained below. For each, a brief summary of the salient issues in their statements is set out, along with the associated documents, and examples of other evidence which corroborates the witnesses’ accounts.

4. The introduction of the Two Witnesses’ Prior Recorded Testimonies into evidence is not prejudicial to, or inconsistent with, the rights of the Accused. They are also of a cumulative or corroborative nature, as set out below. Granting the request will enhance the expeditiousness

¹ Annex A (A1 to A2) lists the Prior Recorded Testimonies of the Two Witnesses which comprise their witness statements (at I), associated material (at II), and the material which the Prosecution does not seek to introduce into evidence (at III). See Directions on the conduct of proceedings, 19 June 2026, [ICC-01/21-01/25-471](#) (“Directions”), para. 59.

² The Directions, [ICC-01/21-01/25-471](#), para. 59.

³ *Ntaganda*, Decision on Prosecution’s request to designate a person authorised to witness a declaration under Rule 68(2)(b) of the Rules, 16 July 2015, [ICC-01/04-02/06-729](#), para. 5; *Yekatom & Ngaïssona*, Decision on the Prosecution’s Request to Designate a Person Authorised to Witness a Declaration under Rule 68(2)(b) of the Rules of Procedure and Evidence, 6 May 2020, [ICC-01/14-01/18-508](#), para. 6. See also *Abd-Al-Rahman* First Rule 68(2)(b) Decision, [ICC-02/05-01/20-612-Red](#), paras. 17-19.

⁴ Confidential Decision on the confirmation of charges, 23 April 2026, ICC-01/21-01/25-417-Conf (public redacted version filed on the same date, [ICC-01/21-01/25-417-Red](#)) (“Confirmation Decision”), paras. 59-66.

⁵ Confirmation Decision, para. 102; Prosecution’s Trial Brief, ICC-01/21-01/25-490-Conf, paras 165-169, 292-295.

of the proceedings, obviate the unnecessary appearance of the witnesses, save valuable court time and resources, and serve the interests of justice.⁶

II. CONFIDENTIALITY

5. Pursuant to regulation 23*bis*(1) of the Regulations of the Court, this application and its Annex A are filed as confidential, as they contain sensitive witness related information. A public redacted version of the application will be filed shortly.

III. SUBMISSIONS

A. Legal Basis

6. The Prosecution incorporates by reference its summary of the applicable law as set out in paragraphs six to ten of its first application under rule 68(2)(b).⁷ The Prosecution also recalls that in this specific case the Chamber has explicitly encouraged the use of rule 68(3) and 68(2)(b).⁸

B. Overview of the Prior Recorded Testimonies of P-1334 and P-1348

7. The Prior Recorded Testimonies of the Two Witnesses may be introduced under rule 68(2)(b). Each witness will attest to their accuracy. Their proposed evidence is particularly relevant to the contextual elements of the crime against humanity, in particular a policy to ‘neutralise’ through violent crimes, including murder, alleged criminals in the Philippines. While some aspects of P-1334’s proposed evidence may relate to issues ‘materially in dispute’,

⁶ Pursuant to article 64(3)(a) of the Statute, the Chamber shall “[c]onfer with the parties and adopt such procedures as are necessary to facilitate the fair and expeditious conduct of proceedings.” *See also Katanga*, Judgment on the Appeal of Mr Katanga Against the Decision of Trial Chamber II of 20 November 2009 Entitled “Decision on the Motion of the Defence for Germain Katanga for a Declaration on Unlawful Detention and Stay of Proceedings”, 12 July 2010, [ICC-01/04-01/07-2259 OA10](#), para. 43 (“The Appeals Chamber observes that expeditiousness is a recurrent theme in the Court’s legal instruments. The Statute and the Rules of Procedure and Evidence place an onus on all those involved in the trial to act in a diligent and expeditious manner in the performance of their obligations. The duty applies to the Chambers of the Court, the parties and participants.[...]”). *See also Ntaganda*, Decision on Prosecution application under Rule 68(3) of the Rules for admission of prior recorded testimony of Witness P-0055, TC VI, 29 October 2015, [ICC-01/04-02/06-961](#), para. 13; *Gbagbo & Blé Goudé*, Decision on Prosecutor’s application under Rules 68(2)(b) and 68(3), 9 June 2016, (“*Gbagbo & Blé Goudé*, Rule 68 Decision”), [ICC-02/11-01/15-573-Red](#), paras. 25, 42; *Yekatom & Ngaissona*, Decision on the Prosecution Extension Request and Initial Guidance on Rule 68 of the Rules, 16 October 2020, (“*Yekatom & Ngaissona* Decision on Initial Guidance Rule 68”), [ICC-01/14-01/18-685](#), para. 26; *Gbagbo & Blé Goudé*, Judgment on the appeals of Mr Laurent Gbagbo and Mr Charles Blé Goudé against the decision of Trial Chamber I of 9 June 2016 entitled “Decision on the Prosecutor’s application to introduce prior recorded testimony under Rules 68(2)(b) and 68(3)”, 1 November 2016, (“*Gbagbo & Blé Goudé* Rule 68 AJ”), [ICC-02/11-01/15-744](#), para. 60; *Bemba et al*, Decision on Prosecution Rule 68(2) and (3) Requests, 12 November 2015, [ICC-01/05-01/13-1478-Red-Corr](#), paras. 48, 51.

⁷ ICC-01/21-01/25-518-Conf, paras 6-10.

⁸ [ICC-01/21-01/25-T-009-Red-ENG](#), p. 13, lines 15-21; ICC-01/21-01/25-T-011-Conf-ENG [ET](#), p. 3, lines 7-12); ICC-01/21-01/25-T-012-CONF-ENG [ET](#), p. 11, line 25 to p. 12, line 5.

including the [REDACTED] involvement in the implementation of the alleged policy, this should not be a hindrance to the admission of his Prior Recorded Testimony under rule 68(2)(b).⁹ Moreover, the Prosecution notes in P-1334 and P-1348's Prior Recorded Testimonies references to potential acts and conduct of the Accused. These include: (i) Mr Duterte's alleged association with the Davao Death Squad ("DDS") and drug cartels;¹⁰ (ii) his targeting of mayors [REDACTED] who did not support him;¹¹ (iii) his use of public funds to pay [REDACTED];¹² and (iv) his public call for drug users to register in *barangays*.¹³ The Prosecution does not intend to rely on these references, which do not constitute the core of their evidence, and as such they should not prevent the admission of P-1334's or P-1348's Prior Recorded Testimony under rule 68(2)(b).¹⁴

8. In addition to the statements of the Two Witnesses, the Prosecution seeks to introduce into evidence the associated material which forms an integral part of their Prior Recorded Testimonies, as listed in Annex A to the Application.¹⁵

(i) *Prior Recorded Testimony of P-1334*

⁹ *Yekatom & Ngaïssona* First Rule 68(2)(b) Decision, [ICC-01/14-01/18-1833-Corr-Red](#), para. 39.

¹⁰ P-1348, PHL-OTP-00232373 at 0022-0025, lines 743-857, PHL-OTP-00232374 at 0007-0008, 0014-0017, lines 183-235, 440-534, PHL-OTP-00232377 at 0012, lines 364-393, PHL-OTP-00232379 at 0004, lines 80-108; P-1334, PHL-OTP-00099947 at 0013-0016, 407-525.

¹¹ P-1334, PHL-OTP-00099945 at 0004, 0006, lines 166-175, 111-121, PHL-OTP-00099946 at 0016, lines 516-523; P-1348, PHL-OTP-00232374 at 0024, lines 778-780, PHL-OTP-00232376 at 0012-0013, lines 393-428. The Prosecution does not consider that the evidence relating to [REDACTED] constitutes the accused's acts and conduct, since the witness later clarified that it was General Albayalde who [REDACTED]. See PHL-OTP-00232376 at 0008-0010, lines 245-328.

¹² P-1334, PHL-OTP-00099947 at 0024-0025, 799-834.

¹³ P-1334, PHL-OTP-00099948 at 0002-0003, 0006-0007, 0011-0012, lines 36-64, 160-202, 345-368, PHL-OTP-00099949 at 0002, 0006-0007, lines 11-16, 166-185.

¹⁴ *Ntaganda* Rule 68(2)(b) Decision P-0773, [ICC-01/04-02/06-1667-Red](#), para. 12; *Yekatom & Ngaïssona* First Rule 68(2)(b) Decision, [ICC-01/14-01/18-1833-Corr-Red](#), paras. 29, 74; *Ongwen*, Decision on Defence Request to Introduce Previously Recorded Testimony Pursuant to Rule 68(2)(b) of the Rules of Procedure and Evidence, [ICC-02/04-01/15-1294](#), para. 5; *Ntaganda*, Decision on Prosecution application for admission of prior recorded testimony of Witnesses P-0020, P-0057 and P-0932 under Rule 68(2)(b), 18 January 2017, ("*Ntaganda* Rule 68(2)(b) Decision P-0020, P-0057 and P-0932"), [ICC-01/04-02/06-1730-Red](#), para. 7; *Ongwen* Rule 68 (2)(b) Decision, [ICC-01/04-02/06-596-Red](#), para. 13; *Abd-Al-Rahman*, First Decision on the Prosecution's requests to introduce prior recorded testimonies under Rule 68(2)(b), 2 March 2022, ("*Abd-Al-Rahman* First Rule 68(2)(b) Decision"), [ICC-02/05-01/20-612-Red](#), para. 16; *Al Hassan*, Decision on second Prosecution request for the introduction of P-0113's evidence pursuant to Rule 68(2)(b) of the Rules, 15 November 2021, [ICC-01/12-01/18-1924](#), para. 13. See also *Al Hassan*, Appeal Judgment of the Decision on second Prosecution request for the introduction of P-0113's evidence pursuant to Rule 68(2)(b) of the Rules, 13 May 2022, ("*Al Hassan* Rule 68(2)(b) AJ"), [ICC-01/12-01/18-2222](#), para. 50. See also *Abd-Al-Rahman*, Decision on the Prosecution's sixth, seventh and eighth rule 68(2)(b) applications, 7 November 2022, [ICC-02/05-01/20-808-Red](#), para. 8 (citing *Al Hassan* Rule 68(2)(b) AJ).

¹⁵ See Annex A (Part II of A1 to A3). Where applicable, the Prosecution includes in the Annex the English translations of items referred to in the Associated Material.

9. P-1334's Prior Recorded Testimony comprises the transcribed statement of the witness's two-day interview [REDACTED], as listed in Annex A1; and the associated items that were used and explained by the witness in his statement, and relate to information and events discussed therein.

10. P-1334 was [REDACTED].¹⁶ During her interview, P-1334 describes the establishment, role, structure, reporting lines, and key personnel of [REDACTED].¹⁷ She specifically addresses co-perpetrator Ronald 'Bato' DELA ROSA's ("DELA ROSA") proximity [REDACTED] leadership, in charge of disseminating his instructions to terminate people during Mr Duterte's anti-drug campaign.¹⁸ P-1334 also speaks of her [REDACTED] intended to identify and prioritise individuals to be included in target lists of drug personalities.¹⁹ P-1334 describes the killings perpetrated [REDACTED], including Incident 53,²⁰ and [REDACTED]²¹ [REDACTED].²² P-1334's Prior Recorded Testimony goes to proof of a policy to 'neutralise' through violent crimes, including murder, alleged criminals in the Philippines. It also provides evidence of the role of different State actors, including [REDACTED], to implement the state policy, and the contribution of co-perpetrator DELA ROSA to the common plan. It further goes to proof of counts 2 and 3 murders committed, in particular Incidents 13 and 53.²³

11. The associated material for P-1334 which the Prosecution seeks to introduce into evidence²⁴ forms an integral part of his Prior Recorded Testimony. These items are also necessary to fully comprehend the witness's account, as she uses and explains them in her statement. P-1334's associated material is comprised of: (i) [REDACTED]; (ii) [REDACTED].

(ii) Prior Recorded Testimony of P-1348

12. P-1348's Prior Recorded Testimony comprises the transcribed statement of the witness's two-day interview of [REDACTED], as listed in Annex A2; and the associated items that were

¹⁶ P-1334, PHL-OTP-00099944, at 0013-0014, 0025-0026, lines 408-438, 819-850.

¹⁷ P-1334, PHL-OTP-00099944, at 0021-0022, 0031, lines 684-722, 1025-1040, PHL-OTP-00099945 at 0014, lines 425-428, PHL-OTP-00099947 at 0003-0004, 0010, 0012-0013, 0020, 0022, lines 43-86, 293-323, 391-411, 648-674, 745-747.

¹⁸ P-1334, PHL-OTP-00099945 at 0011, lines 317-323, PHL-OTP-00099947 at 0010, lines 293-318, PHL-OTP-00099948 at 0002-0003, 0006-0009, 0012, lines 13-64, 160-278, 383-387.

¹⁹ P-1334, PHL-OTP-00099944, at 0020-0021, 0026-0030, lines 640-688, 852-1003, PHL-OTP-00099948 at 0003-0008, 0010-0011, 0017-0022, lines 85-126, 160-247, 325-343, 560-733.

²⁰ P-1334, PHL-OTP-00099944 at 0022-0025, 0030, lines 725-816, 1009-1011, PHL-OTP-00099947 at 0018-0019, lines 600-619.

²¹ P-1022.

²² P-1334, PHL-OTP-00099945 at 0022-0027, lines 742-770, 815-925.

²³ Prosecution's Trial Brief, ICC-01/21-01/25-490-Conf, paras 165-169, 292-295.

²⁴ See Annex A1, Part II.

used and explained by the witness in her statement, and relate to information and events discussed therein.

13. P-1348 was [REDACTED].²⁵ P-1348 provides evidence on [REDACTED] operations prior to July 2016, including in terms of cooperation between [REDACTED] of drug suspects.²⁶ P-1348 also describes (i) the existence of [REDACTED] in July 2016,²⁷ (ii) [REDACTED], and (iii) the killing of some of the listed individuals.²⁸ P-1348 further describes the increase of killings [REDACTED] after July 2016²⁹ and the existence of killing quotas and financial rewards.³⁰ P-1348's Prior Recorded Testimony goes to proof of a policy to 'neutralise' through violent crimes, including murder, alleged criminals in the Philippines. It also provides evidence of [REDACTED] around July 2016 and of the climate of violence in the Philippines at the beginning of the Presidential period.

14. The associated material for P-1348 which the Prosecution seeks to introduce into evidence³¹ forms an integral part of his Prior Recorded Testimony. These items are also necessary to fully comprehend the witness's account, as she uses and explains them in his statement. P-1348's associated material is comprised of (i) [REDACTED]; (ii) [REDACTED]; (iii) [REDACTED];³² (iv) [REDACTED]; and (v) a media article.

C. The Prior Recorded Testimonies are admissible under rule 68(2)(b)

15. The Prior Recorded Testimonies that the Prosecution seeks to introduce into evidence, pursuant to rule 68(2)(b) of the Rules, are relevant, reliable and probative.³³

²⁵ P-1348, PHL-OTP-00232372 at 0006-0010, 0012-0018, lines 169-172, 195-320, 380-393, 433-435, 444-583, PHL-OTP-00232373 at 0003-0004, lines 71-78, PHL-OTP-00232374 at 0013-0014, lines 419-425.

²⁶ P-1348, PHL-OTP-00232372 at 0020-0022, lines 652-724, PHL-OTP-00232373 at 0003, 0013-0017, lines 37-70, 423-543, PHL-OTP-00232375 at 0005-0006, lines 120-163, PHL-OTP-00232376 at 0002-0006, lines 13-147.

²⁷ P-1348, PHL-OTP-00232372 at 0010-0011, lines 311-337, PHL-OTP-00232373 at 0006-0021, 0022-0023, 0024-0025, lines 145-155, 156-186, 187-320, 321-333, 334-844, PHL-OTP-00232374 at 0002-0006, 0013, 0017-0018, 0021-0025, lines 10-170, 406-407, 542-578, 700-816, PHL-OTP-00232376 at 0008-0009, 0014-0018, lines 245-251, 443-570, 573-582, PHL-OTP-00232377 at 0010-0011, lines 303-313, 340-350, PHL-OTP-00232379, at 0005-0006, lines 130-170.

²⁸ P-1348, PHL-OTP-00232374 at 0006-0010, 0011-0012, 0014, 0026-0027, lines 171-172, 173-188, 240-318, 319-334, 335-355, 426-434, 876-877, 898-900, PHL-OTP-00232375 at 0025, lines 831-838, PHL-OTP-00232377 at 0013-0026, lines 397-858.

²⁹ P-1348, PHL-OTP-00232375 at 0023-0026, lines 773-803, 804-827, 855-878, 879-889.

³⁰ P-1348, PHL-OTP-00232377 at 0007-0012, lines 191-302, 351-360.

³¹ See Annex A2, Part II.

³² PHL-OTP-00100038, PHL-OTP-00100039, PHL-OTP-00100040. [REDACTED] is composed of three pages— each page being registered under distinct ERN numbers.

³³ *Gbagbo & Blé Goudé* Rule 68 Decision, [ICC-02/11-01/15-950-Red](#), para. 22.

16. P-1334 and P-1348's Prior Recorded Testimonies were obtained by the Prosecution in the ordinary course of its investigation, when the witnesses were interviewed pursuant to article 55(1) of the Statute and rule 111 of the Rules, with the audio-recordings of their interviews – transcribed, resulting in the interview transcripts forming their Prior Recorded Testimonies. The Prior Recorded Testimonies were conducted in English, a language that the Two Witnesses fully understand.³⁴ The Two Witnesses were informed of the voluntary nature of their interviews and of their rights.³⁵ Other issues, including the principle of confidentiality and protection measures³⁶ were also explained to each witness. The Two Witnesses were reminded, and agreed, to be truthful during their interviews.³⁷ Finally, at the conclusion of the interviews the witnesses confirmed that they answered the questions of their own free will and had no complaints about the way the interview was conducted.³⁸ The Prior Recorded Testimonies of the Two witnesses are internally consistent.³⁹ Accordingly, they have the necessary indicia of reliability for introduction into evidence.

D. The Prior Recorded Testimonies of the Two Witnesses are cumulative to, and corroborative of, evidence to be provided by *viva voce* witnesses

17. The Prior Recorded Testimonies of the Two Witnesses on the contextual elements of crimes against humanity, in particular a policy to 'neutralise' through violent crimes, including murder, alleged criminals in the Philippines, are cumulative in nature, and corroborative of other evidence,⁴⁰ as described in the following paragraphs.

18. P-1334's evidence relating to Incidents 13 and 53 as well as concerning DELA ROSA's role in the implementation of the alleged policy is corroborative of, and cumulative to, the evidence expected to be provided by, in particular, *viva voce* witness P-1210 and P-1262 respectively. P-1334's evidence on the [REDACTED] implementation of the alleged policy is corroborative of, and cumulative to, the evidence expected to be provided by, in particular, *viva voce* witness P-1077 and P-1262; and witnesses P-1087 and P-1151.

³⁴ P-1334, PHL-OTP-00099944 at 0002, lines 20-29; P-1348, PHL-OTP-00232372 at 0002, lines 20-23.

³⁵ P-1334, PHL-OTP-00099944 at 0002-0003, lines 33-41; P-1348, PHL-OTP-00232372 at 0002, lines 27-35.

³⁶ P-1334, PHL-OTP-00099944 at 0003, lines 54-74; P-1348, PHL-OTP-00232372 at 0004-0005, lines 78-102, 126-128.

³⁷ P-1334, PHL-OTP-00099944 at 0004, lines 98-102; P-1348, PHL-OTP-00232372 at 0005, lines 135-138.

³⁸ P-1334, PHL-OTP-00099949 at 0026-0027, lines 899-911; P-1348, PHL-OTP-00232379 at 0007-0008, lines 214-222.

³⁹ *Gbagbo & Blé Goudé* Rule 68 AJ, [ICC-02/11-01/15-744 OA 8](#), para. 3; *Ntaganda* Rule 68(2)(b) Decision P-0020, P-0057 and P-0932, [ICC-01/04-02/06-1730-Red](#), para. 13.

⁴⁰ See *Bemba* Rule 68 AJ, [ICC-01/05-01/08-1386](#), para. 78.

19. P-1348's evidence relating to the climate of violence in the Philippines and the shift in the conduct of [REDACTED] at the beginning of the Presidential period is corroborative of, and cumulative to the evidence expected to be provided by, in particular, *viva voce* witnesses P-0009, P-1160, P-1263, and P-1302; and witnesses P-0004, P-1162, P-1340, P-1341, P-1371, and P-1400. P-1348's evidence on the existence of HVT lists and killing of individuals recorded on such lists is corroborative of, and cumulative to the evidence expected to be provided by, in particular, *viva voce* witnesses P-1077, P-1439 and witness P-1170.

E. The introduction of the Prior Recorded Testimonies of the Two Witnesses is not prejudicial to, or inconsistent with the rights of the Accused

20. The introduction of the Prior Recorded Testimonies of the Two Witnesses into evidence would not be prejudicial to, or inconsistent with the rights of the Accused, given the nature of the testimony of each witness, as set out above.⁴¹ Furthermore, the Defence retains the possibility to cross-examine other *viva voce* and rule 68(3) witnesses on the basis of information contained in the Prior Recorded Testimonies, lead contradictory evidence during the Defence case, or – to the extent that discrepancies exist with any other evidence – advance arguments on the weight to be attributed to the Prior Recorded Testimonies.

IV. CONCLUSION

21. For the above reasons, the Prosecution respectfully requests that the Chamber admit the proposed Prior Recorded Testimonies of the Two Witnesses *in lieu* of their *viva voce* testimony, as set out at Annex A.



Mame Mandiaye Niang, Acting Prosecutor

Dated this 26th day of October 2026

At The Hague, the Netherlands

⁴¹ See Bemba Rule 68 AJ, [ICC-01/05-01/08-1386](#), para. 78. See also Yekatom & Ngaïssona First Rule 68(2)(b) Decision, [ICC-01/14-01/18-1833-Corr-Red](#), para. 27; Al Hassan Rule 68(2)(b) AJ, [ICC-01/12-01/18-2222](#), para. 55.